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ELECTRONICALLY FILED
DOC #:
DATE FILED: 9/11/14

WILMERHALE

August 21, 2014

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Via ECF

Hon. Colleen McMahon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
Courtroom: 14C
New York, NY 10007-1312

Re: *GPIF-I Equity Co., Ltd., et al. v. HDG Mansur Investment Services, Inc., et al.*,
Case No. 13 Civ. 547 (CM)

Dear Judge McMahon:

MEMO ENDORSED

I write on behalf of GPIF-I Equity Co., Ltd. and GPIF-I Finance Co., Ltd. ("Plaintiffs") in the above-captioned matter to provide the Court with a copy of the Particulars of Claim asserted by Al-Muthanna Investment Company, et al., against Harold Garrison and HDG Mansur Investment Services, Inc., defendants in above-captioned matter, in the High Court of Justice, Queen's Bench Division, Commercial Court in the United Kingdom (the "Al Muthanna litigation").

In the 211 count complaint, the Al-Muthanna claimants allege that they were induced by Garrison to invest in a Shari'ah compliant real estate development administered by a Garrison-controlled entity through agreements with underlying project companies and that Garrison and the entities he controlled misappropriated funds from the project companies and engaged in deceit to hide the misappropriation. Similar to the case pending before your Honor, the claimants in the Al Muthanna litigation assert that:

- Garrison, through various HDG entities that were under his "absolute control and direction," ¶ 26, "systematically and consistently misappropriated funds from the Project Companies in breach of Agreements and for the benefit of Mr. Garrison and/or his corporate entities . . ." ¶ 12.
- The HDG asset manager entity "has taken steps demonstrably intended to hide the fact and extent of that misappropriation, by bringing into existence false invoices and by falsely describing the those invoices in the records of the Project Companies." ¶ 12.
- Garrison and HDG entities accomplished the misappropriation by retroactively increasing the amount of asset management fees and charging the increased amount to the project companies, among other overcharges, and that in reporting to claimants about

9/10/2014
Look, this case is
going to trial. You
have evidence,
put it in
evidence -
that
there is a
parallel
case
more in
not at
all.
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the development, Garrison omitted to disclose sums being charged by the HDG entities.
¶¶ 104, 195.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles C. Platt", written in a cursive style.

Charles C. Platt

Encl.

cc: Francis J. Earley, Esq. (via ECF and email)
John S. McMahon III, Esq. (via ECF and email)
Scott A. Rader, Esq. (via ECF and email)